

Oliver Todd
777 Silver Tip Way
Sunnyvale, CA 94086



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Chris Reinar, SFD-9-4
US Environmental Protection Agency, Region IX
75 Hawthorne St
San Francisco, CA 94105

Chris Reiner, SFD-9-4
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

August 18, 2008

Dear Chris Reiner,

I am responding to your department's letter of August 5, 2008 originated by Daniel Meer.

Union City Chemicals (UCC) ceased all business as of May 1, 1987 and went into Defecto Dissolution. We collected all viable receivables and paid our creditors "pro rata" with these funds.

The principal stockholder and president, Martin Verbeet ran the business until he died in May, 1986. I was in the sales department and did not manage the day to day business dealings. I tried to operate and salvage the company but was not able to do so. To the best of my memory Union City Chemicals never used the services of Bay Area Drum during my year of management. I have our last computer print out of all of Union City Chemical's creditors and Bay Area Drum is not listed on it. (see A/P p.15) I used American Drum Co. in San Leandro, CA. (see A/P p.14)

Union City Chemicals never bought or resold any Polychlorinated Biphenyls (PCBs), Dichloro-Diphenyl-Trichloroethane (DDT), Chlordane, Dieldrin, Lead, Zinc or Mercury. I have our last computer print out of all of the chemicals we sold.

Union City Chemicals liquidated the chemical and equipment inventories after a California certified appraiser appraised the equipment. The chemicals were sold to CP Inorganics, 34400 Zwissig Way, Union City, CA and Pacific Coast Chemical Co., 2424 – 4th St, Berkeley, CA at the prices paid by Union City Chemicals. These funds were used to pay off a loan to CP Inorganics and were distributed to the creditors of Union City Chemicals on a pro rata basis.

Union City Chemicals neither formed nor sought any mergers with any company. We followed the advice of our attorney and proceeded with the Defecto Dissolution. Our attorney was Robert L. Ward, 610 – 16th St., Oakland, CA 94612.

Union City Chemicals is dissolved and has no business address. I am no longer employed. I lost my entire investment in Union City Chemicals. I will be 71 in September 2008. My primary income now is from my Social Security and Medicare benefits.

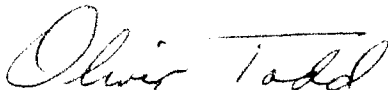
I have enclosed Robert Wards' June 10, 1996 letter to Joseph J. Armao to demonstrate the consistency of my story.

I have enclosed Union City Chemicals accounts payable (A/P) page 14 print out of May 28, 1987. American Drums A/P from October 1, 1986 to March 17, 1987 covers \$570.00 dollar volume over a seven month period. The low total A/P indicates that I used drum reconditioners to a minimum. Instead, I used Chemcentral and East Bay Oil for our solvent supplies and Jones Chemicals for our aqua ammonia and acid supplies. UCC returned the empty drums to each vendor and they took care of cleaning and refilling the drums for UCC.

I have enclosed accounts payable page 15 alphabetical listing of vendors to UCC "B" section showing the absence of Bay Area Drums as a vendor to UCC.

Lastly, Union City Chemicals has been out of business for years and there is no one to consent in any event.

Sincerely,

A handwritten signature in cursive script that reads "Oliver Todd".

Oliver Todd
777 Silver Tip Way
Sunnyvale, CA 94086
Ex-President
Union City Chemicals

ROBERT L. WARD

LAW OFFICES OF
ROBERT L. WARD

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June 10, 1996

Joseph J. Armao, Esq.
KELLER EHRMAN WHITE & MCAULIFFE
333 Bush Street
San Francisco, CA 94104-2878

Re: Bay Area Drum Site, S.F.
vs. Oliver Todd
(for Union City Chemical)

Dear Mr. Armao:

We have not done well in reaching each other by phone, so I'll start by responding to your letter of May 24, 1996.

About 1986 or 87 this office assisted Union City Chemical in a defacto dissolution. The principal stockholder and president who literally ran the business had died about one year previously. Mr. Oliver Todd, who owned less than 30% then tried to operate and salvage the company, but was not able to do so. To the best of his memory Union City Chemical never used the services of Bay Area Drum Site during his year of management, and he is not aware of prior use.

After he finished working for Union City Chemical, he went to work for Pacific Coast Chemical, Inc. who had no connection with Union City Chemical. For your information he no longer is employed by Pacific.

Earlier this year I spoke to Kevin James, the Deputy Attorney General, who processed the DTSC Order. Union City Chemical, Inc. has been out of business for years and there is no one to consent in any event. Pacific Coast Chemical, Inc. never used Bay Area Drum Site to Mr. Todd's knowledge and had no relationship to Union City, so they probably ignored this Order. Mr. James indicated he had secured adequate consent and would not be pursuing others, particularly where questionable liability.

James J. Armao, Esq.
June 10, 1996
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Lastly, Mr. Todd lost his nest egg when Union City went under and has no non-exempt asset, thus, if he had a responsibility, it would merely motivate a bankruptcy.

If I can be of further assistance, please advise.

Very truly yours,

RLW/be
cc: Oliver Todd

ROBERT L. WARD

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